



April 20, 2021

Dr. Christopher Moore, Executive Director  
Mid-Atlantic Fishery Management Council  
800 North State Street, Suite 201  
Dover, DE 19901

**Re: Bluefish Allocation and Rebuilding Amendment**

Dear Dr. Moore,

The American Saltwater Guides Association (ASGA) is a coalition of recreational fishing guides, small businesses, and conservation-minded anglers who find greater value in long-term stock abundance rather than simply maximizing harvest. We are committed to the concept of “better business through conservation,” reflecting our belief that a precautionary approach to fisheries management based on the best available science provides higher-quality fishing opportunities that bolster the recreational fishing economy. Bluefish are a keystone species to recreational fishermen and our coalition, and we are thankful for the opportunity to comment on this amendment.

The bluefish fishery is predominantly recreational, as reflected by historic allocations and catch data. The 2018 revised Marine Recreational Information Program (MRIP) data resulted in recreational catch and harvest estimates much greater than previously believed. In August 2019, bluefish were declared overfished, although overfishing was not occurring. The Council adopted management measures to constrain the recreational sector in December 2019, but to the best of our knowledge bluefish remain overfished, current mortality levels are near overfishing levels, and recreational landings continue to exceed limits.

It is important to note that the recreational bluefish fishery, which makes up roughly 80-90% of historic mortality, is mostly a catch-and-release fishery. From 2010-2019, even with the federal bag limit at 15 fish per person with no size limit, Atlantic coast recreational anglers released about two thirds of the bluefish they caught annually.<sup>1</sup> This demonstrates that the recreational sector values the opportunity to repeatedly encounter bluefish, often more than intentionally harvesting them. The bluefish fishery thus represents a prime example of the value of fish left in the water.

We understand the “ebb and flow” nature of the bluefish stock but believe that there is a great opportunity to improve bluefish management. As such, it is imperative that the stock be efficiently rebuilt to best realize the value and benefits of the fishery.

Below are our views on each of the issues contained in this amendment:

**Fishery Management Plan Goals and Objectives**

**We support the proposed set of goals and objectives (Alternative 1a).** However, we would like to suggest that the following objective be added: “Objective 2.3: perform biennial optimum yield analyses to better understand the resource and values therein.” MSA requires fisheries management measures to achieve optimum yield, which is defined as a fishery’s maximum sustainable yield “as

reduced by any relevant economic, social, or ecological factor.”<sup>2</sup> Since catch-and-release fishing, which depends on lots of fish in the water, is such a major component of the recreational bluefish fishery, its impact on optimum yield—namely, the socioeconomic benefits that come from reduced harvest and increased abundance—should not be ignored.

### Commercial/Recreational Allocations

While we would normally support allocation based on catch rather than landings and one that solely uses baseline data from the most recent timeframes, **we support Alternative 2a-4 for the following reasons.**

At present, the bluefish stock is overfished, SSB has declined considerably since 2009, and there is a very strong possibility that overfishing occurred in 2019 and 2020. From a management perspective, we believe that base years should include timeframes when the stock was at historically abundant levels. The additional inclusion of recent timeframes will inform how the fishery is currently being utilized. The stock was at its largest in the early 1980s and experienced surges in 1999, 2003, and 2006. Alternative 2a-4 includes catch data from all of those high biomass years as well as landings data from more recent timeframes.

We do not support a phase in because the percentages included in the sub-alternatives would seem to have little real effect—**thus, for efficiency’s sake, we prefer Alternative 2b-1.**

### Commercial Allocation to the State

We do not wish to offer opinions on the commercial fishery-focused alternatives within the document.

### Rebuilding Plan

We strongly believe that the rebuilding plan is the most important component of this amendment. Legally, the Council must adopt a plan by November of this year and rebuild the stock by 2029. **We support Alternative 4c, which is based on the Council’s risk policy and projected to rebuild the stock within five years.** This alternative is precautionary to the resource while still providing some short-term opportunity for harvest. The bluefish fishery thrives when the stock is healthy, and rebuilding quickly is critical.

### Quota Transfer Provisions

As highlighted above, the recreational bluefish fishery is a predominantly catch-and-release fishery that derives significant value from fish left in the water. We do not support the practice of transferring unused “quota” from the recreational sector to the commercial sector. Recreational anglers choose to release the majority of bluefish, indicating that the primary value of the recreational fishery is in encountering them and catching them—and more often than not, releasing them. Viewing intentionally released fish as unused quota and then transferring it to the commercial sector negates the conservation value of voluntary release practices and manifests a fundamental misunderstanding of the fishery. Additionally, the revised MRIP data tells us that many of the past recreational-to-commercial transfers should not have even occurred.

Recreational anglers enjoy the opportunity to encounter this fish and should not be punished for releasing them. We view transfers in this fishery as a form of disincentivizing the practice of catch and release that ignores the benefits it provides.

**For these reasons, we do not support either alternative, but rather recommend transfers be removed from the Bluefish Fishery Management Plan.**

#### Management Uncertainty Alternatives

We recognize the need for all fishery sectors to be held accountable, and while we understand the challenges in anticipating and monitoring recreational catch, the uncertainties that such challenges engender should not negatively impact the commercial sector. While we would like to learn more about the specifics of how recreational uncertainty will be considered in reducing recreational harvest limits, **we support 6b, the post-sector split.** In addition, we recommend that the Council support human-dimensions research concerning bluefish angler preferences and values, which could better inform future management decisions and more accurately predict recreational effort, an area of particular uncertainty.

#### De Minimis Provisions

*De minimis* states land less than 0.1% of the coastwide commercial landings for the year before, and the FMP does not subject these to recreational management measures. It is our view that these states contribute so minimally to the coastwide stock that additional measures are futile in practice. **Thus, we prefer the status quo option: 7a.** However, as currently written *de minimis* status is determined solely by commercial landings; we would be remiss to not highlight the opportunity for states to “game” this system as conservation equivalency has been used in other fisheries.

Thank you for providing all of the relevant information on this amendment and for considering our input.

Sincerely,



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<sup>1</sup> Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division, April 19, 2021.

<sup>2</sup> Magnuson–Stevens Fishery Conservation and Management Act, 16 U.S.C. § 1802 (2012).